

HILBRICH, CUNNINGHAM & SCHWERD

Attorneys at Law

2637 - 45TH STREET
HIGHLAND, INDIANA 46322
TELEPHONE (219) 924-2427
FAX (219) 924-2481

JOHN FRANCIS HILBRICH
WILLIAM J. CUNNINGHAM
ROBERT M. SCHWERD
MARCE RONZALEZ, JR.
MICHAEL J. DOBOSZ
DANIEL B. VINOVIK
KAREN TALLIAN

PORTER COUNTY
695 CENTRAL AVENUE
PORTAGE, INDIANA 46368
TELEPHONE (219) 762-2224

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

August 27, 1992

EPA Region 5 Records Ctr.



205254

Karen Martin
Community Relations Coordinator
US EPA
77 West Jackson Avenue
Chicago, Illinois 60604

Re: Proposed Plan for Remedial Action
American Chemical Services Superfund Site, Griffith, Indiana

Dear Ms. Martin:

On behalf of the Town of Griffith, I offer the following comments on the proposed remedial action at the above site.

A. Comments Regarding Groundwater Pumping

1. Alternative 6b requires site dewatering through a ground water pump and treat system. A portion of the treated ground water will be discharged to the western wetlands. Options for discharge of the remaining treated ground water include discharge to the Hammond POTW, discharge to the drainage ditch running through the western wetlands, discharge directly to Turkey Creek or a tributary, and reinjection. These options would suggest that the discharge water would be clean or free of contaminants. The Town of Griffith needs assurance that the discharge waters would not violate the Sewer Use Ordinance or otherwise contain any substances which could damage their sewer system in any way and that the waste would be acceptable to treatment by the Hammond Sanitary District.

US EPA

August 27, 1992

Page Two

2. According to the information received, the EPA proposed plan for remedial action, Alternative 6b, would be implemented for six to eight years. There is no mention of the quantities of waste to be pumped through the Town of Griffith sewer system for eventual treatment at the Hammond POTW. This information must be provided to make sure the Town of Griffith sewer system is hydraulically capable of handling the proposed additional flows. Also, the Town of Griffith would require reimbursement for any changes or improvements to their system which may have to be made to handle the additional flows. The Town also needs to know the composition of the waste to be able to check to see if it can be treated by the Hammond Sanitary District.
3. The Town of Griffith shall require reimbursement of any costs incurred for conveyance and treatment of the additional flows to the Hammond POTW based on the rates and regulations in existence at that time.

B. Comments Regarding Low-Temperature Thermal Treatment

The Town hereby expresses its concern about this facet of the proposed remedy based on three possible problems.

1. We are not convinced that Indiana State laws regarding incineration allow this. I.C. §13-7-16.5-9 prohibits incineration of materials contaminated with or including PCBs. At the public hearing, EPA simply stated that low-temperature thermal treatment is not the same as incineration, but we believe this interpretation is questionable.
2. The Town is also concerned that low-temperature thermal treatment may not be adequate to properly treat the contaminants at this site. This could result in the later need for high-temperature treatment. The Town objects that this could happen solely through later administrative decisions without public hearings and input from the citizens and officials of the Town of Griffith.

US EPA

August 27, 1992

Page Three

3. The Town also expresses concern that the low-temperature thermal treatment will produce toxic air emissions that are not adequately filtered out or that otherwise violate Federal and/or State clean air standards.

I appreciate the opportunity to offer these comments. We request that they be included as part of the official Administrative Record of Decision.

Sincerely,

HILBRICH, CUNNINGHAM & SCHWERT

A handwritten signature in cursive script, appearing to read "Karen Tallian", written in black ink.

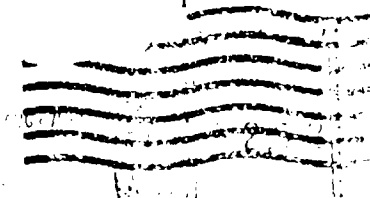
Karen Tallian

KT/dlb

HILBRICH, CUNNINGHAM & SCHWERT

Attorneys at Law

2637 45TH STREET
HIGHLAND, INDIANA 46322



Karen Martin
Community Relations Coordinator
US EPA
77 West Jackson Avenue
Chicago, Illinois 60604

